

Daniella Gordon

Direct T 267.780.2017 F 215.405.9070

dgordon@atllp.com



November 2, 2020

The Honorable Lewis A. Kaplan, U.S.D.J.
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Donald Laguardia
1:19-cr-00893-LAK

Dear Judge Kaplan:

We thank the Court for its recent Order granting defense counsel, Eric M. Creizman, permission to use an iPad for purposes of document management and presentation at trial in the above-captioned matter.

In light of social distancing protocols, the defense team recognizes that it will be unable to jointly access trial exhibits from a single device. The defense team will not have a paralegal present at trial. Accordingly, we have loaded a duplicate version of the designated trial exhibits onto a separate iPad for my use during the proceedings. The only application that has been downloaded onto the device is Trial Pad, the document management program being utilized by the defense team. The device does not have a data plan, nor will it have WiFi access. The Trial Pad program is not available for use on a laptop.

For these reasons, and in an attempt to synchronize and mitigate document access issues during trial, we respectfully request a modification of the electronic device Order, allowing permission for me to bring an iPad to Court strictly for use of the Trial Pad document management program during trial.

We thank the Court for its consideration of this request. A proposed form of order pertaining to the use of electronic and computing devices is attached.

Respectfully submitted,

Daniella Gordon

DG:sah

November 2, 2020

Page 2

Encl.

Cc: Andrew Mohan, Courtroom Deputy (all via ECF)
Elisha Kobre, Esq., AUSA
Max Micholas, Esq., AUSA
Eric Creizman, Esq.